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 25 TESLA, INC.

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 18
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

19 TESLA, INC., Plaintiff,
 20 v.
 21 MARTIN TRIPP, Defendant.

22 Case No. 3:18-cv-00296-MMD-CLB

23
 24
**TESLA'S NOTICE REGARDING THE
 25 EXECUTION OF SETTLEMENT
 TERMS; CERTIFICATION OF
 COMPLIANCE**

26
 27
 28 AND RELATED COUNTERCLAIMS

1 Tesla, Inc., hereby submits this Notice, and the certification of compliance attached hereto
2 as Exhibit A, regarding its compliance with the terms of the confidential Settlement Agreement,
3 entered between the parties on November 30, 2020.

4 **1. Destruction of Confidential Materials.** Section 16 of the Protective Order
5 requires that each party return or destroy all “Discovery Materials” of the other party within 90
6 days of the final disposition of the case. Accordingly, Tesla has until no later than March 1, 2021
7 to certify and file with the Court its compliance with the Protective Order. The Protective Order
8 defines “Discovery Materials” as “all items or information, including from any non-party,
9 regardless of the medium or manner generated, stored, or maintained (including, among other
10 things, testimony, transcripts, or tangible things) that are produced, disclosed, or generated in
11 connection with discovery or Rule 26(a) disclosures in this case.” Tesla’s certification of
12 compliance is attached hereto as Exhibit A.

13 DATED this 1st day of March, 2021.

14 QUINN EMANUEL URQUHART &
15 SULLIVAN, LLP

16 By: /s/ Alex Spiro
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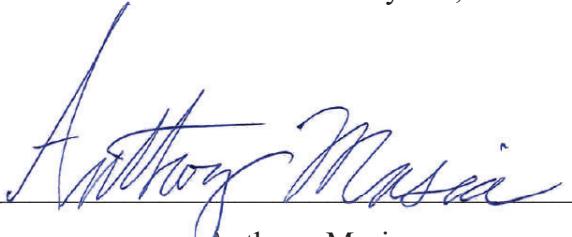
1 EXHIBIT A
2
3

4 CERTIFICATION OF COMPLIANCE
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7 I, Anthony Masia, certify as follows:
8
9

- 10 1. I am a Staff Litigation Paralegal at Tesla, Inc.
11
- 12 2. I have or caused to be destroyed all physical copies of Martin Tripp's Discovery Materials,
13 including all information Mr. Tripp designated Confidential and Attorneys' Eyes Only, in
14 Tesla's possession;
15
- 16 3. I have or caused to be deleted all electronic copies of Mr. Tripp's Discovery Materials,
17 including all information Mr. Tripp designated Confidential and Attorneys' Eyes Only, on
18 any and all electronic devices Tesla owns, whether or not such devices are currently in
19 Tesla's physical possession, including any back-up of such devices such as on Cloud
20 storage or email.
21

22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct and that this document was executed in Sunnyvale, California, on
24 March 1, 2021.
25



26 Anthony Masia
27
28